



Richard C. Schoenstein, Partner  
212.216.1120  
[rschoenstein@tarterkrinsky.com](mailto:rschoenstein@tarterkrinsky.com)

August 1, 2019

*Via ECF*

Hon. Denis R. Hurley, U.S.D.J.  
United States District Court  
for the Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

***Re: Capricorn Management Systems, Inc. v. Government Employees  
Insurance Co., 15-cv-02926-DRH-SIL***

Dear Judge Hurley:

We represent Plaintiff Capricorn Management Systems, Inc. (“Capricorn”) and write to request an extension of the parties’ time to file objections to the Order, Reports and Recommendation of Magistrate Judge Steven I. Locke (the “R&R”), which was filed on July 22, 2019. Pursuant to the R&R, any objections would be due to be filed on or about August 5, 2019.

The R&R is 67 pages long and relates to four substantive motions and four motions to seal documents, all of which follows voluminous filings by the parties. Submitting objections in short order would be difficult under any circumstances, particularly in light of the specificity of such objections required in the relevant rules and case law. Adding to that the challenges of August vacation schedules, and a trial in another matter for Plaintiff’s counsel, Plaintiff seeks a more suitable briefing schedule from the Court.

Accordingly, Plaintiff hereby requests that a schedule be set requiring any objections to the R&R to be filed on or before September 13, 2019, with all opposition papers due on or before November 8, 2019, and all reply papers due on or before November 22, 2019.

There have been no previous requests to extend the time for objections to the R&R. There are no other pending dates in this action that would be impacted by the schedule sought. Defendants do not oppose this request.

Respectfully submitted,

/s/ Richard C. Schoenstein  
Richard C. Schoenstein

cc: Counsel of Record (via CM/ECF)